

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

United States of America, et al.,

Case No. 1:24-cv-03973 (AS)(SLC)

Plaintiffs,

v.

Live Nation Entertainment, Inc. and
Ticketmaster L.L.C.,

Defendants.

**NON-PARTY, CITY OF ORLANDO’S MOTION FOR REIMBURSEMENT OF FEES,
COSTS, AND EXPENSES FOR COMPLYING WITH SUBPOENA TO PRODUCE
DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 45, non-party, City of Orlando (“City”), files this Motion for Reimbursement of Fees, Costs, and Expenses for Complying with Subpoena to Produce Documents and in support thereof states as follows:

Non-party, City of Orlando, was served with a Subpoena to produce documents on September 19, 2024, with responsive documents due on or before October 21, 2024. The City intends to comply with the subpoena, but doing so will require reviewing, compiling, and bates-stamping the vast majority of the files maintained by the Orlando Venues Department, which are maintained in both electronic and paper form. As the City has just begun the document collection process—which encompasses a ten-year period—the exact number of hours expended on this task is unknown, though it will undoubtedly require significant labor by both attorneys and staff. In an abundance of caution and to ensure the filing of a timely Motion,¹ the City moves for an Order

¹ While this Court has explained that “under Rule 45, a nonparty is not rigidly required to seek reimbursement for the costs of compliance prior to responding to a subpoena,” the only timeframe

awarding reimbursement of the fees, costs, and expenses incurred in responding to the Subpoena, with the understanding that the City will supplement this Motion with information regarding the number of hours expended and the volume of responsive documents involved once that information becomes known.

WHEREFORE, non-party, City of Orlando, hereby requests that this Court GRANT its Motion for Reimbursement of Fees, Costs, and Expenses for Complying with Subpoena to Produce Documents and grant any other relief deemed just and proper.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via the United States District Court, Southern District of New York, E-Filing Portal upon the following counsel:

Counsel for Plaintiffs: Sarah Licht
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for filing a Motion under Rule 45 is “before the earlier of the time specified for compliance or 14 days after the subpoena is served,” making that deadline October 3, 2024. *Prescient Acquisition Grp., Inc. v. MJ Publ’g Trust*, No. 05-civ-6298 (PKC), 2006 WL 2996645, *2 (S.D.N.Y. Oct. 13, 2006); *In re First Am. Corp.*, 184 F.R.D. 234, 239 (S.D.N.Y. 1998); Fed. R. Civ. P. 45(2)(B).

Dated: October 3, 2024

Respectfully Submitted,

/s/London Ott

London Ott

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